



Rebecca Zisek, Esq.
Tel 973.443.3242
Fax 973.301.8410
rebecca.zisek@gtlaw.com

Lisa Simonetti, Esq.
Tel 310.586.7824
Fax 310.586.7800
simonettl@gtlaw.com

November 2, 2022

VIA ECF

The Honorable Leda Dunn Wettre, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Case No. 2:20-cv-07712,
Manetta, et al. v. Navient Corporation, et al.

Dear Judge Wettre:

Pursuant to the Amended Scheduling Order (“Order”) (Dkt. 76) dated August 11, 2022, defendants Navient Corporation (“Navient Corp.”) and Navient Solutions, LLC (“NSL”) submit this status letter.

As instructed by the Court, plaintiffs Brian Manetta, Sergio Pereira, Esther Sygal-Pererira, Matthew Markosian, Naimish Baxi, Harvey Minano, Sydney Peck, Mahmud Ibrahim, and George Amores (collectively, “Plaintiffs”) served Amended Document Requests (“Amended Requests”) to Navient Corp. and NSL on July 8, 2022. Plaintiffs also served a notice of Rule 30(b)(6) deposition on July 8, 2022. On September 29, 2022, Plaintiffs took the Rule 30(b)(6) deposition of John

Greenberg Traurig, LLP | Attorneys at Law

1840 Century Park East | Suite 1900 | Los Angeles, California 90067-2121 | T +1 310.586.7700 | F +1 310.586.7800

Albany. Amsterdam. Atlanta. Austin. Berlin. Boston. Chicago. Dallas. Delaware. Denver. Fort Lauderdale. Houston. Las Vegas. London.[†] Los Angeles. Mexico City.[†] Miami. Milan.[‡] Minneapolis. New Jersey. New York. Northern Virginia. Orange County. Orlando. Philadelphia. Phoenix. Sacramento. Salt Lake City. San Francisco. Seoul.[§] Shanghai. Silicon Valley. Tallahassee. Tampa. Tel Aviv.[¶] Tokyo.[¶] Warsaw.[¶] Washington, D.C. West Palm Beach. Westchester County.

Operates as: [†]Greenberg Traurig Germany, LLP; [‡]A separate UK registered legal entity; [¶]Greenberg Traurig, S.C.; [¶]Greenberg Traurig Santa Maria; [¶]Greenberg Traurig LLP Foreign Legal Consultant Office; [¶]A branch of Greenberg Traurig, P.A., Florida, USA; [¶]hGT Tokyo Horitsu Jimusho and Greenberg Traurig Gaiokuhojimubegoshi Jimusho; [¶]Greenberg Traurig Nowakowska-Zimoch Wysokinski sp.k.

Hon. Leda Dunn Wettre, U.S.M.J.

November 2, 2022

Page 2

Zemetro, which was continued from September 28, 2022 at the request of Plaintiffs' counsel. Following the deposition of Mr. Zemetro, Plaintiffs reviewed the 30(b)(6) transcript and spoke with their consultant regarding the parameters and format for the unnamed borrower records, which relate to Plaintiffs' Amended Request Nos. 4, 15, and 18, and seek promissory notes, payment histories, and transaction histories of all "unnamed borrowers." Plaintiffs advised that they are looking for the random sample set records to be produced as follows: raw data either in searchable pdf format or output the data into a CSV file and/or pipe delimited text file (accompanied by a Data Dictionary). NSL is discussing this proposal with its internal team.

NSL noticed the depositions of two third parties, Maulik Sanghavi ("Sanghavi"), and his wife, Michelle Robalino-Sanghavi ("Robalino-Sanghavi"), to take place on September 12 and 13, 2022. During the short session of the deposition taken on September 12, 2022, Sanghavi claimed to have identified alleged improper transactions on his and Robalino-Sanghavi's loans. NSL suspended the deposition when it became clear that the Court's guidance was necessary. NSL also continued Robalino-Sanghavi's deposition, which had been set for September 13, 2022, as Sanghavi stated that his positions on questioning of her would be the same. *See* Dkt. 80. Pursuant to the Court's directions, letters on this dispute have been submitted, and a telephone conference will take place on November 8, 2022. *See* Dkt. Nos. 81-89.

NSL also deposed the final named plaintiff, Matthew Markosian, on October 12, 2022. NSL has otherwise completed its discovery, and will proceed toward dispositive motions.

The discovery cutoff date was September 30, 2022. Plaintiffs sought an extension of the discovery end date (Dkt. 77), by ninety (90) additional days, to December 30, 2022. NSL submitted a response to Plaintiffs' letter (Dkt. 79), outlining its efforts to timely move this matter forward in accordance with the Court's deadlines and instructions. NSL further asked for the Court's consideration on timing. The Court has expressed concern for the schedule at prior conferences, but NSL would need time to handle additional discovery, if any. To date, Plaintiffs have not sought leave from the Court to pursue any necessary, proposed, "clean up" discovery requests.

* * *

Hon. Leda Dunn Wettre, U.S.M.J.

November 2, 2022

Page 3

We thank the Court for assisting with this matter.

Respectfully submitted,

/s/ Lisa Simonetti
Lisa Simonetti

cc: All counsel of record (via ECF)